

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON ELECTION WAVE CASES  
LISTED IN EXHIBIT A TO PLAINTIFFS'  
NOTICE OF ADOPTION

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
OF SHELBY THAMES FOR ELECTION WAVE**

Plaintiffs filed a Notice of Adoption [Dkt. 7323] in the Election Wave cases identified in Exhibit A to their Notice adopting their Motion to Exclude the Opinions and Testimony of Shelby Thames and Supporting Memorandum from Ethicon Wave 1 Dkt. #2039, Wave 2 Dkt. #2455 and Wave 3 Dkt. #2839. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Shelby Thames in Ethicon Wave 1, Dkt. #2187, Wave 2, Dkt. #2553 and Wave 3, Dkt. #2957. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in Waves 1, 2 and 3 response briefings.

Dated: December 20, 2018

Respectfully submitted,

/s/ Susan M. Robinson

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ Susan M. Robinson

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